



SDMS DocID 282332

Supplemental Records
Wells G & H
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March 1, 2007

VIA HAND DELIVERY

U.S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114
ATTN: Wells G&H Case Team

Re: Supplemental Request for Information Pursuant to Section 104 of
CERCLA in relation to the former Whitney Barrel Company at the Wells
G & H Superfund Site in Woburn, MA.

Dear Ms. Bosworth:

Boston Edison Company hereby responds to the above-referenced supplemental information request dated January 4, 2007. Based on telephone conversations with EPA Attorney Susan Scott the time period for submittal of this response was extended to March 2, 2007.

Should EPA have any questions concerning this response, please contact me at (617) 424-2141.

Very truly yours,


Jeffrey N. Stevens
Assistant General Counsel

Enclosures

cc: Susan Scott, Esquire EPA w/out enclosures

0004-0350



800 Boylston Street Boston, Massachusetts 02199

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U.S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114
ATTN: Wells G&H Case Team

Re: Supplemental Request for Information Pursuant to Section 104 of
CERCLA in relation to the former Whitney Barrel Company at the Wells
G & H Superfund Site in Woburn, MA.

Dear Ms. Bosworth:

Boston Edison Company hereby responds to the above-referenced supplemental information request dated January 4, 2007. Based on telephone conversations with EPA Attorney Susan Scott the time period for submittal of this response was extended to March 2, 2007.

Should EPA have any questions concerning this response, please contact me at (617) 424-2141.

Very truly yours,



Jeffrey N. Stevens
Assistant General Counsel

Enclosures

cc: Susan Scott, Esquire EPA w/out enclosures

0004-0351

**SUPPLEMENTAL RESPONSE
OF BOSTON EDISON COMPANY
TO EPA'S SUPPLEMENTAL REQUEST FOR INFORMATION
PURSUANT TO § 104 OF CERCLA
IN RELATION TO THE FORMER WHITNEY BARREL COMPANY
AT THE WELLS G & H SUPERFUND SITE IN WOBURN, MA**

This response is submitted by Boston Edison Company¹ ("Boston Edison" or the "Company") to the "Supplemental Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, MA," which was issued by the United States Environmental Protection Agency (EPA) by letter dated January 4, 2007.

EPA's January 4, 2007 letter states that EPA has information associating Boston Edison with the Whitney Barrel Company, 256 Salem Street, Woburn, MA ("Whitney Barrel") situated within the Wells G & H Superfund Site in Woburn, MA (the "Site"). As EPA's cover letter states, documentation available to EPA indicates that Boston Edison Company sent used drums containing transformer oil and possibly other hazardous materials to the former Whitney Barrel for reconditioning. EPA's correspondence contains two deposit slips showing transactions between Boston Edison and Whitney Barrel. EPA has also provided excerpts from an interview and a deposition with two former Whitney Barrel employees indicating that Whitney Barrel picked up used barrels containing transformer oil believed to be from Boston Edison. Based on this documentation, EPA would like to obtain further information from the Company regarding the types and quantities of materials used and wastes generated by Boston Edison and the Company's relationship to the former Whitney Barrel. As such, EPA has requested that the Company supplement its March, 2004 response to EPA's original Section 104(e) Information Request, focusing on reviewing and supplementing, as necessary, the Company's responses to all sections of questions 3, 4, 5, and 7. The period being investigated is from 1950 through 1985.

With the receipt of the above referenced additional information provided by EPA, Boston Edison undertook a further investigation regarding possible dealings between Boston Edison and Whitney Barrel. As was the case with its initial effort in responding to EPA's original Information Request, the Company was unable to locate any documents indicating that the Company did business with Whitney Barrel. As part of its due diligence the Company contacted additional current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. Based on conversations with several individuals, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Company's Service Center located at 1165 Massachusetts Avenue, Dorchester, Massachusetts (the "Mass Ave Facility"). According to the recollections of these current employees and retirees, these services consisted of the pick-up of empty barrels from the Company's transformer oil

¹ Effective January 1, 2007, Boston Edison Company changed its name to NSTAR Electric Company.

reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil (and one individual recalled that on some occasions liquid lubricants such as kerosene). The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

Based on the information provided by EPA and the information provided by the Company's employees and retirees, Boston Edison provides the following supplemental responses pertaining to its Service Center located at 1165 Massachusetts Avenue, Dorchester, Massachusetts and more specifically regarding the Oil House and the barrels that previously contained transformer oil or kerosene. It should be noted that, due to the lack of specific documentation relative to Whitney Barrel or the Site and the fact that the information request seeks a vast quantity of detailed information for a 35 year time period going back more than 50+ years, and for which documentation no longer exists, the Company's supplemental responses are based on the recollections of individuals who have been retired from the Company for upwards of 25 years.

Finally, the Company is providing a supplemental response to each specific request (and their sub-parts) that requires a supplemental response based on the additional information supplied by the Company's employees and retirees regarding Whitney Barrel and the barrel reconditioning services provided by Whitney Barrel at Boston Edison's Mass Ave Facility. Boston Edison believes that all other responses contained in the Company's March 2004 response do not require supplementation.

1. General Information About Respondent

- a. Provide the full legal name and mailing address of Respondent.

SUPPLEMENTAL RESPONSE:

NSTAR Electric Company
800 Boylston Street
Boston, MA 02199

2. Respondent's Legal Status

- a. If the Respondent has ever done business under any other name;

- i. list each such name; and
- ii. list the dates during which such name was used by Respondent.

SUPPLEMENTAL RESPONSE: Effective January 1, 2007 Boston Edison Company changed its name to NSTAR Electric Company.

3. Respondent's Operations

- c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3 a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:
 - i. would have been produced, processed, or used in connection with facility operations; or
 - ii. would have been present in materials produced, processed, or used in connection with facility operations.

SUPPLEMENTAL RESPONSE: The Company does not possess any current documentation responsive to this request for the period being investigated. However, based on the information provided by the Company's current or retired employees regarding the barrel reclamation services performed by Whitney Barrel at the Company's Mass Ave Facility, the Company is aware of the following chemical constituents listed in Enclosure F of the EPA's letter: PCBs may have been a constituent of transformer oils; waste oils.

- j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

4. Respondent's Wastes and Waste Streams (including By-Products)

- a. Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

SUPPLEMENTAL RESPONSE: See attached Waste Survey for the Mass Ave Facility regarding used transformer oil and the barrels associated with same.

- b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
- i. its physical state;
 - ii. its name and chemical composition;
 - iii. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
 - iv. the dates (beginning and ending) during which type of waste was produced by Respondent's operations.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any documents, however, based on the recollections of the current employees and retirees interviewed, the following information was provided:

- Used transformer oil would arrive at the Mass Ave Facility from the field as a result of maintenance and/or repair being performed on electrical equipment.
- Used oil was also drained into drums as a result of network and distribution transformers being serviced and repaired in Building #2.
- *The used oil drums were moved to the oil house where the transformer oil was transferred into a tank for processing.*
- Empty drums would then be sent out to be cleaned.
- Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility.
- These services consisted of the pick-up of empty 55-gallon barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and

painting of these barrels (they were painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility.

- The barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene.
- Barrels that contained product other than transformer oil would be returned to the applicable vendor, as these drums typically had return deposits.
- The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison.
- The Company was not able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used;
- vi. where each type of waste was collected/stored; and
- vii. if those containers were used, a description of the prior use of the containers.

SUPPLEMENTAL RESPONSE: Based on information provided by current and former employees, the following is a description of how used transformer oil was managed at the Mass Ave Facility. Used transformer oil would arrive at the Mass Ave Facility from the field as a result of maintenance and/or repair being performed on electrical equipment. Used oil was also drained into drums as a result of network and distribution transformers being serviced and repaired in Building #2. The used oil drums were moved to the oil house where the transformer oil was transferred into a tank for processing. Empty drums would then be sent out to be cleaned. Around 1980 Boston Edison bought a mobile oil treatment plant to use in the field at stations. This resulted in significantly less use for the oil house at the Mass Ave Facility. By 1985, the mobile treatment plant was replaced by the oil house at the new Watertown Facility which also was designed to process transformer oil.

Upon information and belief, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility. According to

the recollections of the current employees and retirees, these services consisted of the pick-up of empty 55-gallon barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (they were painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene. Barrels that contained product other than transformer oil would be returned to the applicable vendor, as these drums typically had return deposits.

The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

- d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 3(j).

- f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel.

Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer;

Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

- a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

SUPPLEMENT RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

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- b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

SUPPLEMENTAL RESPONSE: See Supplemental Response 5(a).

- c. For the previous three responses, also provide each individual's:
 - i. job title;
 - ii. duties;
 - iii. dates performing those duties;
 - iv. supervisors for those duties;

- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

SUPPLEMENTAL RESPONSE: See Supplemental Response 5(a).

- e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:
 - i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
 - ii. the colors of the containers;
 - iii. any distinctive stripes or other markings on those containers;
 - iv. any labels or writing on those containers (including the content of those labels);
 - v. whether those containers new or used; and
 - vi. if those containers were used, a description of the prior use of the containers.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment or recycling.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- h. State where Respondent sent each type of its waste, including barrels and empty barrels for disposal, treatment or recycling.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- k. For each type of waste specify which Waste Carrier picked it up.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- m. For each type of waste state the volume picked up by each Waste Carrier (per week, month or year).

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- n. For each type of waste state the dates (beginning and ending) such waste was picked up by each Waste Carrier.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- o. Provide copies of all documents containing information responsive to the previous seven questions.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

SUPPLEMENTAL RESPONSE: Unknown

- q. Indicate the ultimate disposal/recycling/treatment location for each type of Waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- s. Describe how Respondent managed pickups for each waste, including but not limited to:
- i. the method for inventorying each type of waste;
 - ii. the method for requesting each type of waste to be picked up;
 - iii. the identify of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
 - iv. the amount paid or the rate paid for the pickup of each type of waste;
 - v. the identity of (see Definition) Respondent's employee who paid the bills; and
 - vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup for each type of waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

SUPPLEMENTAL RESPONSE: Upon information and belief, Whitney Barrel determined that the barrels would be reconditioned at Whitney Barrel's place of business.

- u. State the basis for and provide any documents supporting the answer to the previous question.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents. The basis for the response to 5(u) is common sense given the fact that Whitney Barrel had their place of business.

- v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did

business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

7. Information Concerning Respondent's Association with the Whitney Barrel Company

- a. Please describe Respondent's business association with the Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: As was the case with its initial effort in responding to EPA's original Information Request, the Company was unable to locate any documents indicating that the Company did business with Whitney Barrel. As part of its due diligence the Company contacted additional current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. Based on conversations with several individuals, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility. According to the recollections of these current employees and retirees, these services consisted of the pick-up of empty barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene. The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

- b. Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including:
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No" please explain. Include but do not limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
 - (a) the name of each material;

- (b) the chemical composition of each material;
- (c) the physical state of each material (e.g., solid, sludge, liquid);
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: Yes, based on the information provided by the Company's employees and retirees.

- i. Unknown
 - ii. Metal barrels
 - iii. 55 gallons
 - iv. Good
 - v.
 - (a) transformer oil residues and possibly kerosene residues
 - (b) unknown
 - (c) liquid
 - vi. Other than the two pages provided by EPA, the Company has been unable to locate any documentation relating to these transactions.
- e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include in your response to:
- i. the type of services(s);
 - ii. the frequency of the service(s)
 - iii. the date(s) of service(s); and
 - iv. please include any documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- i. Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

0004-0364

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

9. Compliance With This Request

- a. If not already provided in response to the questions above, describe all sources reviewed or consulted in responding to this request, including but not limited to:
 - i. the names of all individuals consulted;
 - ii. the current job title and job description of each individual consulted;
 - iii. the job title and job description during the period being investigated of each individual consulted;
 - iv. whether each individual consulted is a current or past employee of Respondent;
 - v. the names of all divisions or offices of Respondent for which records were reviewed;
 - vi. the nature of all documents reviewed;
 - vii. the locations where those documents reviewed were kept prior to review; and
 - viii. the location where those documents reviewed are currently kept.

SUPPLEMENTAL RESPONSE: The information is already provided in the responses to the questions, above.

DECLARATION

I declare under penalty of perjury that I am authorized to respond to the subject supplemental information request on behalf of NSTAR Electric Company f/k/a Boston Edison Company and that based on investigation and inquiry I believe the foregoing response to be complete, true, and correct.

Executed on March 1, 2007

Sandra J. Little

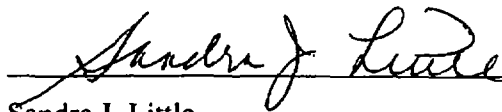
Director, Environmental Affairs Department

NSTAR Electric & Gas Corporation

DECLARATION

I declare under penalty of perjury that I am authorized to respond to the subject supplemental information request on behalf of NSTAR Electric Company f/k/a Boston Edison Company and that based on investigation and inquiry I believe the foregoing response to be complete, true, and correct.

Executed on March 1, 2007

A handwritten signature in cursive script, reading "Sandra J. Little", written over a horizontal line.

Sandra J. Little

Director, Environmental Affairs Department
NSTAR Electric & Gas Corporation

0004-0367

ENCLOSURE E-WASTE SURVEY

Name of Respondent: Boston Edison Company

Respondent's Location: Mass Ave Facility Date: 3/1/07

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Acids				
	Adhesives				
	Asbestos				
	Adsorbents (from spills, leaks, etc.)				
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				
	Oils				

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	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
	Etching Solutions				
	Filters				

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	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
*	Lubricants	liquid - Residue in empty 55 gal barrels	KEROSENE	UNKNOWN	barrels reconditioned by Whitney Barrel - years unknown
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
	other:				
	Paint and Coating Wastes:				

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	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
*	PCBs (polychlorinated biphenyls)	liquid - residue in empty 55 gal barrels	Unknown	Unknown - may have been a constituent of residual transformer oil in empty barrels	barrels reconditioned by Whitney Barrel - years unknown
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				

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other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				



NSTAR

ELECTRIC

GAS

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JS EPA Region 1, Mail Room

U. S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration
One Congress Street, Suite 1100
Boston, MA 02114
ATTN: Wells G&H Case Team

(MBS)